

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**


JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

**IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**THIS DOCUMENT RELATES TO
ETHICON WAVE 3 CASES**

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DEFENDANTS' MOTION TO EXCEED PAGE LIMITATION

Defendants Ethicon, Inc., Ethicon LLC, and Johnson & Johnson respectfully request that the Court afford them leave to exceed the 20-page limitation set forth in Local Rule 7.1(a)(2), as it relates to the memoranda of law supporting their forthcoming motion to exclude the general expert opinions of Dr. Vladimir Iakovlev, M.D. As support for this motion, Defendants submit that there are many aspects of Dr. Iakovlev's opinions that are subject to detailed challenge.

Defendants feel constrained in their ability to present all the grounds for the exclusion of Dr. Iakovlev in a 20-page brief. Because it is important to set forth these grounds in detail and the Court will benefit from a comprehensive assessment of the grounds to exclude Dr. Iakovlev, a page extension is appropriate.

Defendants would further note that, because this matter involves a "wave" of many cases, particularly detailed briefs are warranted. Moreover, unlike other cases, Dr. Iakovlev intends to provide a number of general opinions about a variety of medical devices at issue, including devices used to treat both stress urinary incontinence as well as pelvic organ prolapse.

For all of these reasons, Defendants submit that they have presented good cause for relief from the page limitation requirement and respectfully request that the Court allow them to present a 25-page brief as it relates to Dr. Iakovlev's general opinions.

Respectfully Submitted,

/s/ David B. Thomas

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CERTIFICATE OF SERVICE

I, David B. Thomas, certify that on September 16, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

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